

IN THE UNITED STATE DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Asbestos Products Liability Litigation (No. VI); MDL 875

Regarding:

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

ROBERT D. BELUE, et al.,

\*

\*

Plaintiffs,

\*

\*

vs.

\*

\* Civil Action No. 2:06CV1034

\*

A. O. SMITH ELECTRICAL PRODUCTS \*  
COMPANY, a division of A. O. SMITH \*  
CORPORATION, et al., \*

\*

\*

Defendants.

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**DEFENDANT GOULDS PUMPS, INC.'S JOINDER IN MOVING  
DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT AND  
BRIEF IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant, Goulds Pumps, Inc., by and through its attorneys of record, hereby joins in and adopts by reference as if set forth fully herein, the Motion for Partial Summary Judgment (Doc. 233) and the Brief Supporting the Motion for Partial Summary Judgment (Doc. 234) filed on behalf of Moving Defendants, Borg Warner Morse TEC, Inc.; Exteco, Inc., f/k/a Thermo Electric Co., Inc.; and The Marley-Wylain Company, d/b/a Weil-McLain Company, Inc. In the filing this Motion for Partial Summary Judgment, Goulds Pumps, Inc. does not in any way waive any grounds set forth in its previously filed Motion to Dismiss, nor does it waive any additional grounds for summary judgment as to any plaintiffs

against whom summary judgment is sought in this motion, nor does it waive any grounds against any plaintiffs against whom summary judgment is not specifically sought in this motion.

Respectfully submitted this 17<sup>th</sup> day of April, 2008.

/s/ F. Grey Redditt, Jr.

F. GREY REDDITT, JR. (ASB-5142-R64F)  
TIMOTHY A. CLARKE (ASB-1440-R67T)

*Attorneys for Goulds Pumps, Inc.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 17th, 2008, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to counsel who are CM/ECF participants.

/s/ F. Grey Redditt, Jr.

F. GREY REDDITT, JR.